

EXHIBIT 14

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

LG.PHILIPS LCD CO., LTD.,

Plaintiff,

v.

TATUNG COMPANY; TATUNG
COMPANY OF AMERICA, INC.;
and VIEWSONIC CORPORATION,

Defendants.

Civil Action No. 04-343-JJF

**PLAINTIFF'S FIFTH SUPPLEMENTAL OBJECTIONS AND ANSWERS TO
DEFENDANT VIEWSONIC CORPORATION'S FIRST SET OF INTERROGATORIES**

Plaintiff LG.Philips LCD Co., Ltd. ("LPL"), by counsel and pursuant to Fed. R. Civ. P. 26 and 33, supplements its objections and responses to Defendant ViewSonic Corporation's ("ViewSonic") First Set of Interrogatories as follows.

PRELIMINARY STATEMENT & GENERAL OBJECTIONS

LPL hereby incorporates its Preliminary Statements and its General Objections from Plaintiff's previous Objections and Answers to Defendant ViewSonic Corporation's First Set of Interrogatories dated March 24, 2006. Those general objections apply to each Interrogatory herein and thus, for convenience, are not repeated after each Interrogatory, and are hereby incorporated into each response.

This set of Objections and Responses incorporates into this single document all of LPL's previously-submitted supplemental objections and responses to Defendant ViewSonic Corporation's First Set of Interrogatories as well as any of LPL's previous supplemental responses.

INTERROGATORIES**INTERROGATORY NO. 1:**

Set forth all contentions that ViewSonic infringes any patent claim asserted in this litigation, directly, indirectly, literally or under the doctrine of equivalents, including an identification of the following: (a) each allegedly infringing product sold by ViewSonic; (b) the specific sections of 35 U.S.C. section 271 that allegedly gives rise to infringement liability for each allegedly infringing product, (c) the specific claims that LPL contends are infringed with respect to each allegedly infringing product, and (d) on a claim by claim basis, where in each allegedly infringing product the claim elements can be located.

OBJECTIONS AND ANSWER:

LPL objects to this Interrogatory to the extent that it seeks information protected by the attorney-client privilege or the work product doctrine. LPL further objects to this Interrogatory because defendants mischaracterize as one interrogatory multiple interrogatories on separate subjects; in responding, LPL counts this Interrogatory as multiple interrogatories. Also, LPL objects to this Interrogatory as seeking information on claim construction and infringing products that is premature and unavailable, including because LPL is awaiting discovery from ViewSonic. Subject to and without waiving these objections and the general objections, and based upon the information presently available, LPL states as follows:

LPL cannot currently identify all infringing ViewSonic products and ViewSonic has failed to provide discovery sufficient for LPL to make such an assessment. LPL is aware of products that infringe the Patents-in-Suit, including ViewSonic VX900 monitors. ViewSonic's liability, however, includes any type of unlawful conduct related to any infringing products, whether direct infringement, contributory infringement, and/or inducing infringement by others. ViewSonic, for example, has at least sold, offered for sale, and/or imported infringing products such as the VX900 monitor.

With respect to the VX900, the infringed claims include, at least, claims 35, 36, and 55 of the '641 patent and claims 33, 34, 35, and 40 of the '718 patent, which are infringed literally, or, in the alternative, under the doctrine of equivalents. The following charts show infringement by comparing the claims of the Patents-in-Suit with the ViewSonic VX900 monitor (*see* corresponding Exhibit A, which is attached to these Interrogatory answers):

Claims in the '641 Patent	ViewSonic VX900 Monitor
35. A rear mountable flat panel display device capable of being mounted to a data processing device, the flat panel display device comprising:	<p>The ViewSonic VX900 monitor contains a Fujitsu FLC48SC8V flat panel TFT LCD module H. The Fujitsu module H, in conjunction with the first support frame C, is rear mounted within the monitor.</p> <p>The monitor is a data processing device as it contains a video processor for processing video data. The monitor is also part of (i.e., a component of) a computer system, where a computer system constitutes a data processing device or system.</p>
a backlight unit including a first frame having a fastening part at a rear surface of the first frame, a flat display panel adjacent to the backlight unit; and	<p>The Fujitsu module H contains a backlight unit and an LCD panel. The LCD panel is a flat display panel that is located immediately in front of the backlight unit.</p> <p>The Fujitsu module H and, therefore, the backlight unit in the Fujitsu module H, are supported by the first support frame C. The first support frame C has screw holes D through its rear surface. Each of the two screw holes D through the rear surface of the support frame C constitutes a fastening part, or at least a portion of a fastening part at the rear surface of a first frame.</p>
a second frame;	The ViewSonic monitor has a front or second support frame K.
Wherein the flat display panel is between the first frame and the second frame, the first frame of the backlight unit capable of being fixed to a housing of the data processing device through the fastening part at the rear surface of the first frame.	<p>Because the flat LCD panel is contained in the Fujitsu module H, the flat LCD panel must, therefore, be positioned between the first support frame C and the second support frame K.</p> <p>The two screw holes D through the rear surface of the first support frame C, together with the two corresponding screws, fix the first support frame C to the rear housing A.</p> <p>The rear housing A protects the monitor, and in</p>

Claims in the '641 Patent	ViewSonic VX900 Monitor
	particular, the components located behind or to the rear of the first support frame C, including the data processing circuitry. As the ViewSonic monitor is a data processing device, or a component of a computer (i.e., a data processing device), the housing associated with the monitor constitutes a housing of a data processing device.
36. The rear mountable flat panel display device according to claim 35, wherein the fastening part includes a fastening hole.	Each of the two screw holes D through the rear surface of the first support frame C constitutes a fastening hole.
55. A rear mountable flat panel display device comprising:	The ViewSonic VX900 monitor contains a Fujitsu FLC48SC8V flat panel TFT LCD module H. The Fujitsu module H, in conjunction with the first support frame C, is rear mounted within the monitor. Thus, the ViewSonic monitor contains a rear mountable flat panel display device.
a first frame having a fastening part at a rear surface of the first frame;	The first support frame C has two screw holes D through its rear surface. Each of the two screw holes D constitutes a fastening part, or at least a portion of a fastening part at the rear surface of a first frame.
a second frame; and	The ViewSonic monitor employs a front frame K located at the front of the Fujitsu module H. This front frame K constitutes a second support frame.
a flat display panel between the first and second frames;	The Fujitsu module H contains a flat LCD panel. Because the flat LCD panel is contained in the Fujitsu module H, the flat LCD panel must be positioned between the first support frame C and the second support frame K.
Wherein the first frame is capable of being fixed to a housing of a data processing device through the fastening part at the rear surface of the first frame.	<p>The two screw holes D, together with the two corresponding screws, fix the first support frame C to the rear housing A.</p> <p>The rear housing A protects the monitor, and in particular, the components located behind or to the rear of the first support frame C, including the data processing circuitry. As the ViewSonic monitor is a data processing device, or a component of a computer (i.e., a data processing device), the housing associated with the monitor constitutes a housing of a data processing device.</p>

Claims in the '718 Patent	ViewSonic VX900 Monitor
<p>33. A method of assembling a rear mountable flat panel display device capable of being mounted to a housing, comprising:</p>	<p>The ViewSonic VX900 monitor includes a Fujitsu FLC48SC8V flat panel TFT LCD module H, a first support frame C and a rear housing A. The Fujitsu module H and the support frame C are rear mounted to the rear housing A. The ViewSonic monitor was therefore assembled in accordance with a method of rear mounting a flat panel display device to a housing.</p>
<p>Placing a flat display panel on a top surface of a backlight unit having a first frame, the first frame having a fastening element for fastening the first frame to the housing, said fastening element being located on a rear surface opposite the top surface of the backlight unit where the flat display panel is placed;</p>	<p>The Fujitsu module H contains a flat LCD panel and a backlight unit. It is understood that the LCD panel is in front of (i.e., on top of) the backlight unit. It can thus be said that the Fujitsu module H is assembled by placing a flat LCD panel on top of a backlight unit.</p> <p>Just behind and providing support for the Fujitsu module H is the first support frame C. The first support frame C has two fastening elements that at least partially involve the two screw holes D. The screw holes D are used in fastening the first frame C to the rear housing A.</p> <p>The screw holes D go through the rear surface of the first support frame C and, therefore, it can be said that they are located on a rear surface of the first support frame C opposite the top surfaced (i.e., the front surface) of the backlight unit.</p>
<p>Placing a second frame on the flat display panel; and</p>	<p>The ViewSonic monitor includes a front or second support frame K. It is located at the front of the Fujitsu module H. It can therefore be said that the second frame K is placed on the flat display panel.</p>
<p>fixing the flat display panel between the first frame of the backlight unit and the second frame.</p>	<p>Because the flat LCD panel is contained in the Fujitsu module H, the flat LCD panel must be positioned between the first support frame C and the second support frame K. Thus, it can be said that the ViewSonic monitor was assembled in accordance with a method that involved fixing the flat LCD panel, contained in the Fujitsu module H, between a first support frame C and a second support frame K.</p>
<p>34. The method of claim 33, wherein the fastening element comprises a fastening hole.</p>	<p>Each of the two screw holes D are fastening holes that constitute a fastening element, or at least a portion of a fastening element.</p>
<p>35. The method of claim 33, wherein the fastening element comprises a screw hole.</p>	<p>Each of the two screw holes D constitutes a fastening element, or at least a portion of a fastening element.</p>

Claims in the '718 Patent	ViewSonic VX900 Monitor
40. A rear mountable method of assembling a liquid crystal display (LCD) device comprising:	The ViewSonic VX900 monitor includes a Fujitsu FLC48SC8V flat panel TFT LCD module H, a first support frame C and a rear housing A. The Fujitsu module H and the support frame C are rear mounted to the rear housing A. Accordingly, the ViewSonic monitor was assembled in accordance with a rear mountable method of assembling a LCD device.
arranging the LCD device on a inner surface of a display case, wherein the display case has an inner surface and back;	The Fujitsu module H and the first support frame C are located just in front of the rear housing A. Therefore, the Fujitsu module H and the first support frame C are arranged on an inner surface of the rear housing A, where the rear housing A constitutes a display case.
attaching the LCD device to the display case from the back of the display case.	The Fujitsu module H and the first support frame C are attached to the rear housing A from the back of the rear housing A, in that the Fujitsu module H is supported by the first frame C, which is rear mounted to the rear housing A by the two screws passing through the rear surface of the rear housing A and through the screw holes D at the rear surface of the first support frame C.

SUPPLEMENTAL RESPONSE & OBJECTION:

LPL objects to this Interrogatory to the extent that it seeks information protected by the attorney-client privilege or the work product doctrine. LPL further objects to this Interrogatory because Defendants mischaracterize as one interrogatory multiple interrogatories on separate subjects; in responding, LPL counts this Interrogatory as multiple interrogatories. Also, LPL objects to this Interrogatory as seeking information on claim construction and infringing products that is premature and unavailable, including because LPL is awaiting discovery from ViewSonic. Subject to and without waiving these objections and the general objections, and based upon the information presently available, LPL states as follows:

LPL cannot currently identify all infringing ViewSonic products and ViewSonic has failed to provide discovery sufficient for LPL to make such an assessment. LPL is aware of products that infringe the Patents-in-Suit, including ViewSonic VX2000 monitors. ViewSonic's

liability, however, includes any type of unlawful conduct related to any infringing products, whether direct infringement, contributory infringement, and/or inducing infringement by others. ViewSonic, for example, has at least sold, offered for sale, and/or imported infringing products such as the VX2000 monitor.

With respect to the VX2000, the infringed claims include, at least, claims 35, 36, and 55 of the '641 Patent and claims 33, 34, 35, and 40 of the '718 Patent, which are infringed literally, or, in the alternative, under the doctrine of equivalents. The following charts show infringement by comparing the claims of the Patents-in-Suit with the ViewSonic VX2000 monitor (*see* corresponding Exhibit B, which is attached to these Interrogatory answers):

Claims in the '641 Patent	ViewSonic VX2000 Monitor
35. A rear mountable flat panel display device capable of being mounted to a data processing device, the flat panel display device comprising:	<p>The ViewSonic VX2000 monitor contains a Fujitsu flat panel TFT LCD module H (serial number FLC51UXC8V). The Fujitsu module H, in conjunction with the first support frame C, is rear mounted within the monitor.</p> <p>The monitor is a data processing device as it contains a video processor for processing video data. The monitor is also part of (i.e., a component of) a computer system, where a computer system constitutes a data processing device or system.</p>
a backlight unit including a first frame having a fastening part at a rear surface of the first frame, a flat display panel adjacent to the backlight unit; and	<p>The Fujitsu module H contains a backlight unit and an LCD panel. The LCD panel is a flat display panel that is located immediately in front of the backlight unit.</p> <p>The Fujitsu module H and, therefore, the backlight unit in the Fujitsu module H, are supported by the first support frame C. The first support frame C has screw holes D through its rear surface. Each of the four screw holes D through the rear surface of the support frame C constitutes a fastening part, or at least a portion of a fastening part at the rear surface of a first frame.</p>
a second frame;	The ViewSonic monitor has a front or second support frame K.
wherein the flat display panel is between the first frame and the second	Because the flat LCD panel is contained in the Fujitsu module H, the flat LCD panel must, therefore, be

Claims in the '641 Patent	ViewSonic VX2000 Monitor
frame, the first frame of the backlight unit capable of being fixed to a housing of the data processing device through the fastening part at the rear surface of the first frame.	<p>positioned between the first support frame C and the second support frame K.</p> <p>The four screw holes D through the rear surface of the first support frame C, together with the four corresponding screws, fix the first support frame C to the rear housing A.</p> <p>The rear housing A protects the monitor, and in particular, the components located behind or to the rear of the Fujitsu module H, including the data processing circuitry. As the ViewSonic monitor is a data processing device, or a component of a computer (i.e., a data processing device), the housing associated with the monitor constitutes a housing of a data processing device.</p>
36. The rear mountable flat panel display device according to claim 35, wherein the fastening part includes a fastening hole.	Each of the four screw holes D through the rear surface of the first support frame C constitutes a fastening hole.
55. A rear mountable flat panel display device comprising:	The ViewSonic VX2000 monitor contains a Fujitsu flat panel TFT LCD module H (serial number FLC51UXC8V). The Fujitsu module H, in conjunction with the first support frame C, is rear mounted within the monitor. Thus, the ViewSonic monitor contains a rear mountable flat panel display device.
a first frame having a fastening part at a rear surface of the first frame;	The first support frame C has four screw holes D through its rear surface. Each of the four screw holes D constitutes a fastening part, or at least a portion of a fastening part at the rear surface of a first frame.
a second frame; and	The ViewSonic monitor employs a front frame K located at the front of the Fujitsu module H. This front frame K constitutes a second support frame.
a flat display panel between the first and second frames;	The Fujitsu module H contains a flat LCD panel. Because the flat LCD panel is contained in the Fujitsu module H, the flat LCD panel must be positioned between the first support frame C and the second support frame K.
wherein the first frame is capable of being fixed to a housing of a data processing device through the fastening part at the rear surface of the first frame.	<p>The four screw holes D, together with the four corresponding screws, fix the first support frame C to the rear housing A.</p> <p>The rear housing A protects the monitor, and in particular, the components located behind or to the rear</p>

Claims in the '641 Patent	ViewSonic VX2000 Monitor
	of the Fujitsu module H, including the data processing circuitry. As the ViewSonic monitor is a data processing device, or a component of a computer (i.e., a data processing device), the housing associated with the monitor constitutes a housing of a data processing device.
Claims in the '718 Patent	ViewSonic VX2000 Monitor
33. A method of assembling a rear mountable flat panel display device capable of being mounted to a housing, comprising:	The ViewSonic VX2000 monitor includes a Fujitsu flat panel TFT LCD module H (serial number FLC51UXC8V), a first support frame C and a rear housing A. The Fujitsu module H and the support frame C are rear mounted to the rear housing A. The ViewSonic monitor was therefore assembled in accordance with a method of rear mounting a flat panel display device to a housing.
placing a flat display panel on a top surface of a backlight unit having a first frame, the first frame having a fastening element for fastening the first frame to the housing, said fastening element being located on a rear surface opposite the top surface of the backlight unit where the flat display panel is placed;	<p>The Fujitsu module H contains a flat LCD panel and a backlight unit. It is understood that the LCD panel is in front of (i.e., on top of) the backlight unit. It can thus be said that the Fujitsu module H is assembled by placing a flat LCD panel on top of a backlight unit.</p> <p>Just behind and providing support for the Fujitsu module H is the first support frame C. The first support frame C has four fastening elements that at least partially involve the four screw holes D. The screw holes D are used in fastening the first frame C to the rear housing A.</p> <p>The screw holes D go through the rear surface of the first support frame C and, therefore, it can be said that they are located on a rear surface of the first support frame C opposite the top surface (i.e., the front surface) of the backlight unit.</p>
placing a second frame on the flat display panel; and	The ViewSonic monitor includes a front or second support frame K. It is located at the front of the Fujitsu module H. It can therefore be said that the second frame K is placed on the flat display panel.
fixing the flat display panel between the first frame of the backlight unit and the second frame.	Because the flat LCD panel is contained in the Fujitsu module H, the flat LCD panel must be positioned between the first support frame C and the second support frame K. Thus, it can be said that the

Claims in the '718 Patent	ViewSonic VX2000 Monitor
	ViewSonic monitor was assembled in accordance with a method that involved fixing the flat LCD panel, contained in the Fujitsu module H, between a first support frame C and a second support frame K.
34. The method of claim 33, wherein the fastening element comprises a fastening hole.	Each of the four screw holes D are fastening holes that constitute a fastening element, or at least a portion of a fastening element.
35. The method of claim 33, wherein the fastening element comprises a screw hole.	Each of the four screw holes D constitutes a fastening element, or at least a portion of a fastening element.
40. A rear mountable method of assembling a liquid crystal display (LCD) device comprising:	The ViewSonic VX2000 monitor includes a Fujitsu flat panel TFT LCD module H (serial number FLC51UXC8V), a first support frame C and a rear housing A. The Fujitsu module H and the support frame C are rear mounted to the rear housing A. Accordingly, the ViewSonic monitor was assembled in accordance with a rear mountable method of assembling a LCD device.
arranging the LCD device on a inner surface of a display case, wherein the display case has an inner surface and back;	The Fujitsu module H and the first support frame C are located just in front of the rear housing A. Therefore, the Fujitsu module H and the first support frame C are arranged on an inner surface of the rear housing A, where the rear housing A constitutes a display case.
attaching the LCD device to the display case from the back of the display case.	The Fujitsu module H and the first support frame C are attached to the rear housing A from the back of the rear housing A, in that the Fujitsu module H is supported by the first frame C, which is rear mounted to the rear housing A by the four screws passing through the rear surface of the rear housing A and through the screw holes D at the rear surface of the first support frame C.

LPL will provide more detailed information regarding the infringing products and asserted claims at the appropriate time and based on further discovery, possibly including, for example, in expert reports and/or *Markman* briefing. LPL reserves the right to supplement this Interrogatory answer, if appropriate, when and if additional information becomes available, or otherwise.

SECOND SUPPLEMENTAL RESPONSE & OBJECTION:

LPL objects to this Interrogatory to the extent that it seeks information protected by the attorney-client privilege or the work product doctrine. LPL further objects to this Interrogatory because Defendants mischaracterize as one interrogatory multiple interrogatories on separate subjects; in responding, LPL counts this Interrogatory as multiple interrogatories. Also, LPL objects to this Interrogatory as seeking information on claim construction and infringing products that is premature and unavailable, including because LPL is awaiting discovery from ViewSonic. Subject to and without waiving these objections and the general objections, and based upon the information presently available, LPL states as follows:

ViewSonic has refused and/or failed to provide discovery for LPL to fully respond to this Interrogatory. The ViewSonic products that LPL is currently aware of that infringe the Patents-in-Suit include the: ViewSonic VX900 (“VX900”); ViewSonic VX2000 (“VX2000”); ViewSonic VA503b (“VA503b”); ViewSonic VG2021m (“VG2021m”); ViewSonic N2000 (“N2000”); ViewSonic VP2030b (“VP2030b”); ViewSonic VX700 (“VX700”); ViewSonic VX924 (“VX924”); ViewSonic VG920 (“VG920”); ViewSonic VP230mb (“VP230mb”); and ViewSonic VP930b (“VP930b”) monitors. ViewSonic’s liability, however, includes any type of improper conduct related to any infringing products, whether by direct infringement, contributory infringement, and/or inducing infringement by others. ViewSonic, for example, has at least sold, offered for sale, and/or imported infringing products such as the VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb, and VP930b monitors.

Although LPL’s attorneys previously identified the ViewSonic VX500 and ViewSonic VP150M as previously within LPL’s possession, custody, or control, those monitors were obtained for use in other litigations. Accordingly, they were destroyed during evaluation of

technologies different than the mounting technologies at issue in this litigation, and are thus no longer available for LPL's inspection in this litigation. LPL reserves the right to supplement this Response to include those monitors if appropriate in the future.

With respect to the VX900 monitors, the infringed claims include, at least, claims 35, 36, 40-45, and 55-56 of the '641 Patent and claims 33-36 and 39-40 of the '718 Patent, which are infringed literally, or, in the alternative, under the doctrine of equivalents. With respect to the VX2000 monitors, the infringed claims include, at least, claims 35, 36, 40-45, 55-56 of the '641 Patent and claims 33-36 and 39-40 of the '718 Patent, which are infringed literally, or, in the alternative, under the doctrine of equivalents.

With respect to the VA503b monitors, the infringed claims include, at least, claims 35, 36, 38-45, and 55-56 of the '641 Patent and claims 33-36 and 39-40 of the '718 Patent, which are infringed literally, or, in the alternative, under the doctrine of equivalents. With respect to the VG2021m monitors, the infringed claims include, at least, claims 35, 36, 40-45, and 55-56 of the '641 Patent and claims 33-36 and 38-40 of the '718 Patent, which are infringed literally, or, in the alternative, under the doctrine of equivalents.

With respect to the N2000 monitors, the infringed claims include, at least, claims 35, 36, 40-45, and 55-56 of the '641 Patent and claims 33-36 and 39-40 of the '718 Patent, which are infringed literally, or, in the alternative, under the doctrine of equivalents. With respect to the VP2030b monitors, the infringed claims include, at least, claims 35, 36, 38-43, and 55-56 of the '641 Patent and claims 33-35 and 39-40 of the '718 Patent, which are infringed literally, or, in the alternative, under the doctrine of equivalents.

With respect to the VX700 monitors, the infringed claims include, at least, claims 35, 36, 40-45, and 55-56 of the '641 Patent and claims 33-35 and 39-40 of the '718 Patent, which are

infringed literally, or, in the alternative, under the doctrine of equivalents. With respect to the VX924 monitors, the infringed claims include, at least, claims 35, 36, 40-45, and 55-56 of the '641 Patent and claims 33-35 and 39-40 of the '718 Patent, which are infringed literally, or, in the alternative, under the doctrine of equivalents.

With respect to the VG920 monitors, the infringed claims include, at least, claims 35, 36, 40-45, and 55-56 of the '641 Patent and claims 33-35 and 39-40 of the '718 Patent, which are infringed literally, or, in the alternative, under the doctrine of equivalents. With respect to the VP930b monitors, the infringed claims include, at least, claims 35, 36, 38-45, and 55-56 of the '641 Patent and claims 33-36 and 39-40 of the '718 Patent, which are infringed literally, or, in the alternative, under the doctrine of equivalents.

With respect to the VP230mb monitors, the infringed claims include, at least, claims 35, 36, 40-45, and 55-56 of the '641 Patent and claims 33-35 and 39-40 of the '718 Patent, which are infringed literally, or, in the alternative, under the doctrine of equivalents.

The following charts show infringement by comparing the claims of the Patents-in-Suit with the VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb and VP930b monitors:

Claims in the '641 Patent	ViewSonic Monitors
35. A rear mountable flat panel display device capable of being mounted to a data processing device, the flat panel display device comprising:	The ViewSonic VX900 ("VX900"), ViewSonic VX2000 ("VX2000"), Viewsonic VA503b ("VA503b"), ViewSonic VG2021m ("VG2021m"), ViewSonic N2000 ("N2000"), ViewSonic VP2030b ("VP2030b"), ViewSonic VX700 ("VX700"), ViewSonic VX924 ("VX924"), ViewSonic VG920 ("VG920"), ViewSonic VP230mb ("VP230mb"), and ViewSonic VP930b ("VP930b") are each a rear mountable flat panel display device capable of being mounted to a data processing device.
a backlight unit including a first frame having a fastening part at a rear surface of the first frame, a flat display panel adjacent to the backlight unit; and	The VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb, and VP930b each have a backlight unit including a first frame having a fastening part at a rear surface of the first frame, a flat display panel adjacent to the backlight unit.
a second frame;	The VX900, VX2000, VA503b, VA2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb and VP930b each have a second frame.
wherein the flat display panel is between the first frame and the second frame, the first frame of the backlight unit capable of being fixed to a housing of the data processing device through the fastening part at the rear surface of the first frame.	The VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb, and VP930b each have a flat display panel that is between the first frame and the second frame, the first frame of the backlight unit capable of being fixed to a housing of the data processing device through the fastening part at the rear surface of the first frame.
36. The rear mountable flat panel display device according to claim 35, wherein the fastening part includes a fastening hole.	In addition to the elements listed above that pertain to the limitations of claim 35, the VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb, and VP930b each have a fastening part that includes a fastening hole.
38. The rear mountable flat panel display device according to claim 36, wherein the fastening part includes at least two fastening holes at two corners of the first frame.	In addition to the elements listed above that pertain to the limitations of claim 36, the VA503b, VP2030b, and VP930b each have fastening parts that include at least two fastening holes at two corners of the first frame.
39. The rear mountable flat panel display device according to claim 36,	In addition to the elements listed above that pertain to the limitations of claim 36, the VA503b, VP2030b, and

Claims in the '641 Patent	ViewSonic Monitors
wherein the fastening part includes four fastening holes at four corners of the first frame.	VP930b each have fastening parts that include four fastening holes at four corners of the first frame.
40. The rear mountable flat panel display device according to claim 35, wherein the backlight unit comprises: a reflector unit adjacent the first frame;	In addition to the elements listed above that pertain to the limitations of claim 35, the VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb, and VP930b each have a backlight unit comprising a reflector unit adjacent the first frame.
a light source unit adjacent the reflector unit; and	The VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb, and VP930b each have a backlight unit comprising a light source unit adjacent the reflector unit.
a light guide unit adjacent the light source unit.	The VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb, and VP930b each have a backlight unit comprising a light guide unit adjacent the light source unit.
41. The rear mountable flat panel display device according to claim 40, further comprising a diffuser unit and a prism unit.	In addition to the elements listed above that pertain to the limitations of claim 40, the VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb, and VP930b each have a diffuser unit and a prism unit.
42. The rear mountable flat panel display device according to claim 35, wherein the fastening part is not visible from a viewing direction of the flat display panel.	In addition to the elements listed above that pertain to the limitations of claim 35, the VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb, and VP930b each have a fastening part that is not visible from a viewing direction of the flat display panel.
43. The rear mountable flat panel display device according to claim 35, wherein the flat panel display device only shows the flat display panel and the second frame when viewed from a viewing direction of the display panel.	In addition to the elements listed above that pertain to the limitations of claim 35, the VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb, and VP930b each have a flat panel display device that only shows the flat display panel and the second frame when viewed from a viewing direction of the display panel.
44. The rear mountable flat panel	In addition to the elements listed above that pertain to

Claims in the '641 Patent	ViewSonic Monitors
display device according to claim 35, wherein the fastening part includes a protruding portion protruding away from the flat display panel.	the limitations of claim 35, VX900, VX2000, VA503b, VG2021m, N2000, VX700, VX924, VG920, VP230mb, and VP930b each have a fastening part that includes a protruding portion protruding away from the flat display panel.
45. The rear mountable flat panel display device according to claim 44, wherein the protruding portion includes a peg having a fastening hole.	In addition to the elements listed above that pertain to the limitations of claim 44, the VX900, VX2000, VA503b, VG2021m, N2000, VX700, VX924, VG920, VP230mb, and VP930b each have a protruding portion that includes a peg having a fastening hole.
55. A rear mountable flat panel display device comprising:	The VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb, and VP930b are each a rear mountable flat panel display device.
a first frame having a fastening part at a rear surface of the first frame;	The VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb, and VP930b each have a first frame having a fastening part at a rear surface of the first frame.
a second frame; and	The VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb, and VP930b each have a second frame.
a flat display panel between the first and second frames;	The VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb, and VP930b each have a flat display panel between the first and second frames.
wherein the first frame is capable of being fixed to a housing of a data processing device through the fastening part at the rear surface of the first frame.	The VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb, and VP930b each have a first frame that is capable of being fixed to a housing of a data processing device through the fastening part at the rear surface of the first frame.
56. A rear mountable flat panel display device comprising:	The VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb, and VP930b are each a rear mountable flat panel display device.
a first frame having a fastening part at	The VX900, VX2000, VA503b, VG2021m, N2000,

Claims in the '641 Patent	ViewSonic Monitors
a rear surface of the first frame;	VP2030b, VX700, VX924, VG920, VP230mb, and VP930b each have a first frame having a fastening part at a rear surface of the first frame.
a second frame;	The VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb, and VP930b each have a second frame.
and a flat display panel between the first and second frames;	The VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb, and VP930b each have a flat display panel between the first and second frames.
wherein the first frame is capable of being fixed to a housing of a data processing device through the fastening part at the rear surface of the first frame and the flat display panel is rear mounted.	The VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb, and VP930b each have a first frame that is capable of being fixed to a housing of a data processing device through the fastening part at the rear surface of the first frame and the flat display panel is rear mounted.

Claims in the '718 Patent	ViewSonic Monitors
33. A method of assembling a rear mountable flat panel display device capable of being mounted to a housing, comprising:	The VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb, and VP930b are each assembled via a method of assembling a rear mountable flat panel display device capable of being mounted to a housing.
placing a flat display panel on a top surface of a backlight unit having a first frame, the first frame having a fastening element for fastening the first frame to the housing, said fastening element being located on a rear surface opposite the top surface of the backlight unit where the flat display panel is placed;	The method of assembling each of the VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb, and VP930b includes placing a flat display panel on a top surface of a backlight unit having a first frame, the first frame having a fastening element for fastening the first frame to the housing, said fastening element being located on a rear surface opposite the top surface of the backlight unit where the flat display panel is placed.
placing a second frame on the flat display panel; and	The method of assembling each of the VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb, and VP930b includes placing a second frame on the flat display panel.

Claims in the '718 Patent	ViewSonic Monitors
fixing the flat display panel between the first frame of the backlight unit and the second frame.	The method of assembling each of the VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb, and VP930b includes fixing the flat display panel between the first frame of the backlight unit and the second frame.
34. The method of claim 33, wherein the fastening element comprises a fastening hole.	In addition to the elements listed above that pertain to the limitations of claim 33, the VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb, and VP930b each have a fastening element that comprises a fastening hole.
35. The method of claim 33, wherein the fastening element comprises a screw hole.	In addition to the elements listed above that pertain to the limitations of claim 33, the VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb, and VP930b each have a fastening element that comprises a screw hole.
36. The method of claim 33, wherein the fastening element comprises a stepped hole.	In addition to the elements listed above that pertain to the limitations of claim 33, the VX900, VX2000, VA503b, VG2021m, N2000, and VP930b each have a fastening element that comprises a stepped hole.
38. The method of claim 33, wherein the fastening element comprises a hook.	In addition to the elements listed above that pertain to the limitations of claim 33, the VG2021m has a fastening element that comprises a hook.
39. A rear mountable method of assembling a liquid crystal display (LCD) device comprising:	The VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb, and VP930b are each assembled via a rear mountable method of assembling a liquid crystal display (LCD) device.
arranging a first frame on a light guide, the first frame having holes for coupling a LCD panel to a supporting frame, the supporting frame having a front surface and a rear surface; and	The method of assembling each of the VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb and VP930b includes arranging a first frame on a light guide, the first frame having holes for coupling an LCD panel to a supporting frame, the supporting frame having a front surface and a rear surface.
coupling the LCD panel, the light	The method of assembling each of the VX900,

Claims in the '718 Patent	ViewSonic Monitors
guide to the first frame from the rear surface of the supporting frame.	VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb, and VP930b includes coupling the LCD panel, the light guide to the first frame from the rear surface of the supporting frame.
40. A rear mountable method of assembling a liquid crystal display (LCD) device comprising:	The VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb, and VP930b are each assembled via a rear mountable method of assembling a liquid crystal display (LCD) device.
arranging the LCD device on a inner surface of a display case, wherein the display case has an inner surface and back;	The method of assembling each of the VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb, and VP930b includes arranging the LCD device on an inner surface of a display case, wherein the display case has an inner surface and back.
attaching the LCD device to the display case from the back of the display case.	The method of assembling each of the VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb, and VP930b includes attaching the LCD device to the display case from the back of the display case.

LPL will provide more detailed information regarding the infringing products and asserted claims at the appropriate time and based on further discovery, possibly including, for example, in expert reports and/or *Markman* briefing. LPL reserves the right to supplement this Interrogatory answer, if appropriate, when and if additional information becomes available, or otherwise.

THIRD SUPPLEMENTAL RESPONSE & OBJECTION:

LPL objects to this Interrogatory to the extent that it seeks information protected by the attorney-client privilege or the work product doctrine. LPL further objects to this Interrogatory because Defendants mischaracterize as one interrogatory multiple interrogatories on separate

subjects; in responding, LPL counts this Interrogatory as multiple interrogatories. Also, LPL objects to this Interrogatory as seeking information on claim construction and infringing products that is premature and unavailable, including because LPL is awaiting discovery from ViewSonic. Subject to and without waiving these objections and the general objections, and based upon the information presently available, LPL states as follows:

ViewSonic has refused and/or failed to provide discovery for LPL to fully respond to this Interrogatory. The ViewSonic products that LPL is currently aware of that infringe the Patents-in-Suit include the: ViewSonic VX900 (“VX900”); ViewSonic VX2000 (“VX2000”); ViewSonic VA503b (“VA503b”); ViewSonic VG2021m (“VG2021m”); ViewSonic N2000 (“N2000”); ViewSonic VP2030b (“VP2030b”); ViewSonic VX700 (“VX700”); ViewSonic VX924 (“VX924”); ViewSonic VG920 (“VG920”); ViewSonic VP230mb (“VP230mb”); ViewSonic VP930b (“VP930b”); ViewSonic VP2130b-1 (“VP2130b-1”), ViewSonic VP191b (“VP191b”), ViewSonic VP191s (“VP191s”), ViewSonic VG710b (“VG710b”), ViewSonic VG710s (“VG710s”), ViewSonic VA903b (“VA903b”), ViewSonic VE150mb (“VE150mb”), ViewSonic VX724 (“VX724”), ViewSonic VX910 (“VX910”), and ViewSonic VX922 (“VX922”) products. ViewSonic’s liability, however, includes any type of improper conduct related to any infringing products, whether by direct infringement, contributory infringement, and/or inducing infringement by others. ViewSonic, for example, has at least sold, offered for sale, and/or imported infringing products such as the VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb, VP930b, VP2130b-1, VP191b, VP191s, VG710b, VG710s, VA903b, VE150mb, VX724, VX910, and VX922 products.

Although LPL’s attorneys previously identified the ViewSonic VX500 and ViewSonic VP150M as previously within LPL’s possession, custody, or control, those products were

obtained for use in other litigations. Accordingly, they were destroyed during evaluation of technologies different than the mounting technologies at issue in this litigation, and are thus no longer available for LPL's inspection in this litigation. LPL reserves the right to supplement this Response to include those products if appropriate in the future.

With respect to the VX900 products, the infringed claims include, at least, claims 35, 36, 44-45, and 55-56 of the '641 Patent and claims 33-36 and 40 of the '718 Patent, which are infringed literally, or, in the alternative, under the doctrine of equivalents. With respect to the VX2000 products, the infringed claims include, at least, claims 35, 36, 44-45, 55-56 of the '641 Patent and claims 33-36 and 40 of the '718 Patent, which are infringed literally, or, in the alternative, under the doctrine of equivalents.

With respect to the VA503b products, the infringed claims include, at least, claims 35, 36, 38-39, 44-45, and 55-56 of the '641 Patent and claims 33-36 and 40 of the '718 Patent, which are infringed literally, or, in the alternative, under the doctrine of equivalents. With respect to the VG2021m products, the infringed claims include, at least, claims 35, 36, 44-45, and 55-56 of the '641 Patent and claims 33-36 and 40 of the '718 Patent, which are infringed literally, or, in the alternative, under the doctrine of equivalents.

With respect to the N2000 products, the infringed claims include, at least, claims 35, 36, 44-45, and 55-56 of the '641 Patent and claims 33-36 and 40 of the '718 Patent, which are infringed literally, or, in the alternative, under the doctrine of equivalents. With respect to the VP2030b products, the infringed claims include, at least, claims 35, 36, 38-39, and 55-56 of the '641 Patent and claims 33-35 and 40 of the '718 Patent, which are infringed literally, or, in the alternative, under the doctrine of equivalents.

With respect to the VX700 products, the infringed claims include, at least, claims 35, 36, 44-45, and 55-56 of the '641 Patent and claims 33-35 and 40 of the '718 Patent, which are infringed literally, or, in the alternative, under the doctrine of equivalents. With respect to the VX924 products, the infringed claims include, at least, claims 35, 36, 44-45, and 55-56 of the '641 Patent and claims 33-35 and 40 of the '718 Patent, which are infringed literally, or, in the alternative, under the doctrine of equivalents.

With respect to the VG920 products, the infringed claims include, at least, claims 35, 36, 44-45, and 55-56 of the '641 Patent and claims 33-35 and 40 of the '718 Patent, which are infringed literally, or, in the alternative, under the doctrine of equivalents. With respect to the VP930b products, the infringed claims include, at least, claims 35, 36, 38-39, 44-45, and 55-56 of the '641 Patent and claims 33-36 and 40 of the '718 Patent, which are infringed literally, or, in the alternative, under the doctrine of equivalents.

With respect to the VP230mb products, the infringed claims include, at least, claims 35, 36, 44-45, and 55-56 of the '641 Patent and claims 33-35 and 40 of the '718 Patent, which are infringed literally, or, in the alternative, under the doctrine of equivalents.

With respect to the VP2130b-1 products, the infringed claims include, at least, claims 35, 36, 38-38, and 55-56 of the '641 Patent and claims 33-35 and 40 of the '718 Patent, which are infringed literally, or, in the alternative, under the doctrine of equivalents.

With respect to the VP191b products, the infringed claims include, at least, claims 35, 36, 38-38, 44-45, and 55-56 of the '641 Patent and claims 33-36 and 40 of the '718 Patent, which are infringed literally, or, in the alternative, under the doctrine of equivalents.

With respect to the VP191s products, the infringed claims include, at least, claims 35, 36, 38-38, 44-45, and 55-56 of the '641 Patent and claims 33-36 and 40 of the '718 Patent, which are infringed literally, or, in the alternative, under the doctrine of equivalents.

With respect to the VG710b products, the infringed claims include, at least, claims 35, 36, 38-38, and 55-56 of the '641 Patent and claims 33-35 and 40 of the '718 Patent, which are infringed literally, or, in the alternative, under the doctrine of equivalents.

With respect to the VG710s products, the infringed claims include, at least, claims 35, 36, and 55-56 of the '641 Patent and claims 33-35 and 40 of the '718 Patent, which are infringed literally, or, in the alternative, under the doctrine of equivalents.

With respect to the VA903b products, the infringed claims include, at least, claims 35, 36, 44-45, and 55-56 of the '641 Patent and claims 33-36 and 40 of the '718 Patent, which are infringed literally, or, in the alternative, under the doctrine of equivalents.

With respect to the VE150mb products, the infringed claims include, at least, claims 35, 36, 44-45, and 55 of the '641 Patent and claims 33-36 and 40 of the '718 Patent, which are infringed literally, or, in the alternative, under the doctrine of equivalents.

With respect to the VX724 products, the infringed claims include, at least, claims 35, 36, 44-45, and 55-56 of the '641 Patent and claims 33-36 and 40 of the '718 Patent, which are infringed literally, or, in the alternative, under the doctrine of equivalents.

With respect to the VX910 products, the infringed claims include, at least, claims 35, 36, 44-45, and 55 of the '641 Patent and claims 33-36 and 40 of the '718 Patent, which are infringed literally, or, in the alternative, under the doctrine of equivalents.

With respect to the VX922 products, the infringed claims include, at least, claims 35, 36, 44-45, and 55 of the '641 Patent and claims 33-36 and 40 of the '718 Patent, which are infringed literally, or, in the alternative, under the doctrine of equivalents.

The following charts show infringement by comparing the claims of the Patents-in-Suit with the VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb VP930b, VP2130b-1, VP191b, VP191s, VG710b, VG710s, VA903b, VE150mb, VX724, VX910, and VX922 products:

Claims in the '641 Patent	ViewSonic Monitors
35. A rear mountable flat panel display device capable of being mounted to a data processing device, the flat panel display device comprising:	The ViewSonic VX900 ("VX900"), ViewSonic VX2000 ("VX2000"), Viewsonic VA503b ("VA503b"), ViewSonic VG2021m ("VG2021m"), ViewSonic N2000 ("N2000"), ViewSonic VP2030b ("VP2030b"), ViewSonic VX700 ("VX700"), ViewSonic VX924 ("VX924"), ViewSonic VG920 ("VG920"), ViewSonic VP230mb ("VP230mb"), ViewSonic VP930b ("VP930b"), ViewSonic VP2130b-1 ("VP2130b-1"), ViewSonic VP191b ("VP191b"), ViewSonic VP191s ("VP191s"), ViewSonic VG710b ("VG710b"), ViewSonic VG710s ("VG710s"), ViewSonic VA903b ("VA903b"), ViewSonic VE150mb ("VE150mb"), ViewSonic VX724 ("VX724"), ViewSonic VX910 ("VX910"), and ViewSonic VX922 ("VX922") are each a rear mountable flat panel display device capable of being mounted to a data processing device.
a backlight unit including a first frame having a fastening part at a rear surface of the first frame, a flat display panel adjacent to the backlight unit; and	The VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb, VP930b, VP2130b-1, VP191b, VP191s, VG710b, VG710s, VA903b, VE150mb, VX724, VX910, and VX922 each have a backlight unit including a first frame having a fastening part at a rear surface of the first frame, a flat display panel adjacent to the backlight unit.
a second frame;	The VX900, VX2000, VA503b, VA2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb VP930b,

Claims in the '641 Patent	ViewSonic Monitors
	VP2130b-1, VP191b, VP191s, VG710b, VG710s, VA903b, VE150mb, VX724, VX910, and VX922 each have a second frame.
wherein the flat display panel is between the first frame and the second frame, the first frame of the backlight unit capable of being fixed to a housing of the data processing device through the fastening part at the rear surface of the first frame.	The VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb, VP930b, VP2130b-1, VP191b, VP191s, VG710b, VG710s, VA903b, VE150mb, VX724, VX910, and VX922 each have a flat display panel that is between the first frame and the second frame, the first frame of the backlight unit capable of being fixed to a housing of the data processing device through the fastening part at the rear surface of the first frame.
36. The rear mountable flat panel display device according to claim 35, wherein the fastening part includes a fastening hole.	In addition to the elements listed above that pertain to the limitations of claim 35, the VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb, VP930b, VP2130b-1, VP191b, VP191s, VG710b, VG710s, VA903b, VE150mb, VX724, VX910, and VX922 each have a fastening part that includes a fastening hole.
38. The rear mountable flat panel display device according to claim 36, wherein the fastening part includes at least two fastening holes at two corners of the first frame.	In addition to the elements listed above that pertain to the limitations of claim 36, the VA503b, VP2030b, VP930b, VP2130b-1, VP191b, VP191s, and VG710b each have fastening parts that include at least two fastening holes at two corners of the first frame.
39. The rear mountable flat panel display device according to claim 36, wherein the fastening part includes four fastening holes at four corners of the first frame.	In addition to the elements listed above that pertain to the limitations of claim 36, the VA503b, VP2030b, VP930b, VP2130b-1, VP191b, VP191s, and VG710b each have fastening parts that include four fastening holes at four corners of the first frame.
44. The rear mountable flat panel display device according to claim 35, wherein the fastening part includes a protruding portion protruding away from the flat display panel.	In addition to the elements listed above that pertain to the limitations of claim 35, VX900, VX2000, VA503b, VG2021m, VX924, VG920, VP230mb, VP930b, VP191b, VP191s, VA903b, VE150mb, VX724, and VX910 each have a fastening part that includes a protruding portion protruding away from the flat display panel.
45. The rear mountable flat panel display device according to claim 44, wherein the protruding portion	In addition to the elements listed above that pertain to the limitations of claim 44, the VX900, VX2000, VA503b, VG2021m, VX924, VG920, VP230mb,

Claims in the '641 Patent	ViewSonic Monitors
includes a peg having a fastening hole.	VP930b, VP191b, VP191s, VA903b, VE150mb, VX724, and VX910 each have a protruding portion that includes a peg having a fastening hole.
55. A rear mountable flat panel display device comprising:	The VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb, VP930b, VP2130b-1, VP191b, VP191s, VG710b, VG710s, VA903b, VE150mb, VX724, VX910, and VX922 are each a rear mountable flat panel display device.
a first frame having a fastening part at a rear surface of the first frame;	The VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb, VP930b, VP2130b-1, VP191b, VP191s, VG710b, VG710s, VA903b, VE150mb, VX724, VX910, and VX922 each have a first frame having a fastening part at a rear surface of the first frame.
a second frame; and	The VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb, VP930b, VP2130b-1, VP191b, VP191s, VG710b, VG710s, VA903b, VE150mb, VX724, VX910, and VX922 each have a second frame.
a flat display panel between the first and second frames;	The VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb, VP930b, VP2130b-1, VP191b, VP191s, VG710b, VG710s, VA903b, VE150mb, VX724, VX910, and VX922 each have a flat display panel between the first and second frames.
wherein the first frame is capable of being fixed to a housing of a data processing device through the fastening part at the rear surface of the first frame.	The VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb, VP930b, VP2130b-1, VP191b, VP191s, VG710b, VG710s, VA903b, VE150mb, VX724, VX910, and VX922 each have a first frame that is capable of being fixed to a housing of a data processing device through the fastening part at the rear surface of the first frame.
56. A rear mountable flat panel display device comprising:	The VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb, VP930b, VP2130b-1, VP191b, VP191s, VG710b, VG710s, VA903b, and VX724 are each a rear mountable flat panel display device.

Claims in the '641 Patent	ViewSonic Monitors
a first frame having a fastening part at a rear surface of the first frame;	The VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb, VP930b, VP2130b-1, VP191b, VP191s, VG710b, VG710s, VA903b, and VX724 each have a first frame having a fastening part at a rear surface of the first frame.
a second frame;	The VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb, VP930b, VP2130b-1, VP191b, VP191s, VG710b, VG710s, VA903b, and VX724 each have a second frame.
and a flat display panel between the first and second frames;	The VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb, VP930b, VP2130b-1, VP191b, VP191s, VG710b, VG710s, VA903b, and VX724 each have a flat display panel between the first and second frames.
wherein the first frame is capable of being fixed to a housing of a data processing device through the fastening part at the rear surface of the first frame and the flat display panel is rear mounted.	The VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb, VP930b, VP2130b-1, VP191b, VP191s, VG710b, VG710s, VA903b, and VX724 each have a first frame that is capable of being fixed to a housing of a data processing device through the fastening part at the rear surface of the first frame and the flat display panel is rear mounted.

Claims in the '718 Patent	ViewSonic Monitors
33. A method of assembling a rear mountable flat panel display device capable of being mounted to a housing, comprising:	The VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb, VP930b, VP2130b-1, VP191b, VP191s, VG710b, VG710s, VA903b, VE150mb, VX724, VX910, and VX922 are each assembled via a method of assembling a rear mountable flat panel display device capable of being mounted to a housing.
placing a flat display panel on a top surface of a backlight unit having a first frame, the first frame having a fastening element for fastening the first frame to the housing, said	The method of assembling each of the VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb, VP930b, VP2130b-1, VP191b, VP191s, VG710b, VG710s, VA903b, VE150mb, VX724, VX910, and VX922

Claims in the '718 Patent	ViewSonic Monitors
fastening element being located on a rear surface opposite the top surface of the backlight unit where the flat display panel is placed;	includes placing a flat display panel on a top surface of a backlight unit having a first frame, the first frame having a fastening element for fastening the first frame to the housing, said fastening element being located on a rear surface opposite the top surface of the backlight unit where the flat display panel is placed.
placing a second frame on the flat display panel; and	The method of assembling each of the VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb, VP930b, VP2130b-1, VP191b, VP191s, VG710b, VG710s, VA903b, VE150mb, VX724, VX910, and VX922 includes placing a second frame on the flat display panel.
fixing the flat display panel between the first frame of the backlight unit and the second frame.	The method of assembling each of the VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb, VP930b, VP2130b-1, VP191b, VP191s, VG710b, VG710s, VA903b, VE150mb, VX724, VX910, and VX922 includes fixing the flat display panel between the first frame of the backlight unit and the second frame.
34. The method of claim 33, wherein the fastening element comprises a fastening hole.	In addition to the elements listed above that pertain to the limitations of claim 33, the VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb, VP930b, VP2130b-1, VP191b, VP191s, VG710b, VG710s, VA903b, VE150mb, VX724, VX910, and VX922 each have a fastening element that comprises a fastening hole.
35. The method of claim 33, wherein the fastening element comprises a screw hole.	In addition to the elements listed above that pertain to the limitations of claim 33, the VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb, VP930b, VP2130b-1, VP191b, VP191s, VG710b, VG710s, VA903b, VE150mb, VX724, VX910, and VX922 each have a fastening element that comprises a screw hole.
36. The method of claim 33, wherein the fastening element comprises a stepped hole.	In addition to the elements listed above that pertain to the limitations of claim 33, the VX900, VX2000, VA503b, VG2021m, VP930b, VP191b, VP191s, VA903b, VE150mb, VX724, and VX910 each have a fastening element that comprises a stepped hole.

Claims in the '718 Patent	ViewSonic Monitors
40. A rear mountable method of assembling a liquid crystal display (LCD) device comprising:	The VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb, VP930b, VP2130b-1, VP191b, VP191s, VG710b, VG710s, VA903b, VE150mb, VX724, VX910, and VX922 are each assembled via a rear mountable method of assembling a liquid crystal display (LCD) device.
arranging the LCD device on a inner surface of a display case, wherein the display case has an inner surface and back;	The method of assembling each of the VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb, VP930b, VP2130b-1, VP191b, VP191s, VG710b, VG710s, VA903b, VE150mb, VX724, VX910, and VX922 includes arranging the LCD device on an inner surface of a display case, wherein the display case has an inner surface and back.
attaching the LCD device to the display case from the back of the display case.	The method of assembling each of the VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb, VP930b, VP2130b-1, VP191b, VP191s, VG710b, VG710s, VA903b, VE150mb, VX724, VX910, and VX922 includes attaching the LCD device to the display case from the back of the display case.

LPL will provide more detailed information regarding the infringing products and asserted claims at the appropriate time and based on further discovery, possibly including, for example, in expert reports and/or *Markman* briefing. LPL reserves the right to supplement this Interrogatory answer, if appropriate, when and if additional information becomes available, or otherwise.

FOURTH SUPPLEMENTAL RESPONSE & OBJECTION:

LPL objects to this Interrogatory to the extent that it seeks information protected by the attorney-client privilege or the work product doctrine. LPL further objects to this Interrogatory

because Defendants mischaracterize as one interrogatory multiple interrogatories on separate subjects; in responding, LPL counts this Interrogatory as multiple interrogatories. Also, LPL objects to this Interrogatory as seeking information on claim construction and infringing products that is premature and unavailable, because the claim construction order has yet to be issued and because LPL is awaiting discovery from ViewSonic. Further, LPL objects because ViewSonic has failed to produce documents held by OEMs, as recommended by the Special Master on February 14, 2007. LPL also objects to responding to this Interrogatory as premature because LPL has yet to conduct its third party discovery and thus this Interrogatory should properly include all infringing products discovered during third party discovery, and thus LPL reserves the right to do so.

Subject to and without waiving these objections and the general objections, and based upon the information presently available, LPL states as follows:

ViewSonic has failed to provide discovery, including documents held by OEMs, that would enable LPL to fully respond to this Interrogatory. LPL reserves the right to supplement this response after it receives those documents. Moreover, LPL reserves the right to supplement this response after it completes its third party discovery.

The ViewSonic products that LPL is currently aware of that infringe the Patents-in-Suit include the: ViewSonic VX900 (“VX900”); ViewSonic VX2000 (“VX2000”); ViewSonic VA503b (“VA503b”); ViewSonic VG2021m (“VG2021m”); ViewSonic N2000 (“N2000”); ViewSonic VP2030b (“VP2030b”); ViewSonic VX700 (“VX700”); ViewSonic VX924 (“VX924”); ViewSonic VG920 (“VG920”); ViewSonic VP230mb (“VP230mb”); ViewSonic VP930b (“VP930b”); ViewSonic VP2130b-1 (“VP2130b-1”), ViewSonic VP191b (“VP191b”), ViewSonic VP191s (“VP191s”), ViewSonic VG710b (“VG710b”), ViewSonic VG710s

(“VG710s”), ViewSonic VA903b (“VA903b”), ViewSonic VE150mb (“VE150mb”), ViewSonic VX724 (“VX724”), ViewSonic VX910 (“VX910”), ViewSonic VX922 (“VX922”), ViewSonic VG2030wm (“VG2030wm”), ViewSonic VP920b (“VP920b”), ViewSonic VX2035wm (“VX2035wm”), ViewSonic VX2235wm (“VX2235wm”), ViewSonic VX2245wm (“VX2245wm”), ViewSonic VG730m (“VG730m”), ViewSonic VP2330 (“VP2330”), ViewSonic VP912b (“VP912b”), ViewSonic VP171 (“VP171”), ViewSonic VG2230wm (“VG2230wm”), ViewSonic VX1945wm (“VX1945wm”), ViewSonic VA703b (“VA703b”), ViewSonic Q170 (“Q170”), ViewSonic VA1930wm (“VA1930wm”), ViewSonic VP201b (“VP201b”), and ViewSonic VG910b (“VG910b”) products. ViewSonic’s liability, however, includes any type of improper conduct related to any infringing products, whether by direct infringement, contributory infringement, and/or inducing infringement by others. ViewSonic, for example, has at least sold, offered for sale, and/or imported infringing products such as the VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb, VP930b, VP2130b-1, VP191b, VP191s, VG710b, VG710s, VA903b, VE150mb, VX724, VX910, VX922, VG2030wm, VP920b, VX2035wm, VX2235wm, VX2245wm, VG730m, VP2330, VP912b, VP171, VG2230wm, VX1945wm, VA703b, Q170, VA1930wm, VP201b, and VG910b products.

Although LPL’s attorneys previously identified the ViewSonic VX500 and ViewSonic VP150M as previously within LPL’s possession, custody, or control, those products were obtained for use in other litigations. Accordingly, they were destroyed during evaluation of technologies different than the mounting technologies at issue in this litigation, and are thus no longer available for LPL’s inspection in this litigation. LPL reserves the right to supplement this Response to include those products if appropriate in the future.

With respect to the VX900 products, the infringed claims include, at least, claims 35, 36, 44-45, and 55-56 of the '641 Patent and claims 33-36 and 40 of the '718 Patent, which are infringed literally, or, in the alternative, under the doctrine of equivalents.

With respect to the VX2000 products, the infringed claims include, at least, claims 35, 36, 44-45, 55-56 of the '641 Patent and claims 33-36 and 40 of the '718 Patent, which are infringed literally, or, in the alternative, under the doctrine of equivalents.

With respect to the VA503b products, the infringed claims include, at least, claims 35, 36, 38-39, 44-45, and 55-56 of the '641 Patent and claims 33-36 and 40 of the '718 Patent, which are infringed literally, or, in the alternative, under the doctrine of equivalents.

With respect to the VG2021m products, the infringed claims include, at least, claims 35, 36, 44-45, and 55-56 of the '641 Patent and claims 33-36 and 40 of the '718 Patent, which are infringed literally, or, in the alternative, under the doctrine of equivalents.

With respect to the N2000 products, the infringed claims include, at least, claims 35, 36, 44-45, and 55-56 of the '641 Patent and claims 33-36 and 40 of the '718 Patent, which are infringed literally, or, in the alternative, under the doctrine of equivalents.

With respect to the VP2030b products, the infringed claims include, at least, claims 35, 36, 38-39, and 55-56 of the '641 Patent and claims 33-35 and 40 of the '718 Patent, which are infringed literally, or, in the alternative, under the doctrine of equivalents.

With respect to the VX700 products, the infringed claims include, at least, claims 35, 36, 44-45, and 55-56 of the '641 Patent and claims 33-35 and 40 of the '718 Patent, which are infringed literally, or, in the alternative, under the doctrine of equivalents.

With respect to the VX924 products, the infringed claims include, at least, claims 35, 36, 44-45, and 55-56 of the '641 Patent and claims 33-35 and 40 of the '718 Patent, which are infringed literally, or, in the alternative, under the doctrine of equivalents.

With respect to the VG920 products, the infringed claims include, at least, claims 35, 36, 44-45, and 55-56 of the '641 Patent and claims 33-35 and 40 of the '718 Patent, which are infringed literally, or, in the alternative, under the doctrine of equivalents.

With respect to the VP930b products, the infringed claims include, at least, claims 35, 36, 38-39, 44-45, and 55-56 of the '641 Patent and claims 33-36 and 40 of the '718 Patent, which are infringed literally, or, in the alternative, under the doctrine of equivalents.

With respect to the VP230mb products, the infringed claims include, at least, claims 35, 36, 44-45, and 55-56 of the '641 Patent and claims 33-35 and 40 of the '718 Patent, which are infringed literally, or, in the alternative, under the doctrine of equivalents.

With respect to the VP2130b-1 products, the infringed claims include, at least, claims 35, 36, 38-38, and 55-56 of the '641 Patent and claims 33-35 and 40 of the '718 Patent, which are infringed literally, or, in the alternative, under the doctrine of equivalents.

With respect to the VP191b products, the infringed claims include, at least, claims 35, 36, 38-38, 44-45, and 55-56 of the '641 Patent and claims 33-36 and 40 of the '718 Patent, which are infringed literally, or, in the alternative, under the doctrine of equivalents.

With respect to the VP191s products, the infringed claims include, at least, claims 35, 36, 38-38, 44-45, and 55-56 of the '641 Patent and claims 33-36 and 40 of the '718 Patent, which are infringed literally, or, in the alternative, under the doctrine of equivalents.

With respect to the VG710b products, the infringed claims include, at least, claims 35, 36, 38-38, and 55-56 of the '641 Patent and claims 33-35 and 40 of the '718 Patent, which are infringed literally, or, in the alternative, under the doctrine of equivalents.

With respect to the VG710s products, the infringed claims include, at least, claims 35, 36, and 55-56 of the '641 Patent and claims 33-35 and 40 of the '718 Patent, which are infringed literally, or, in the alternative, under the doctrine of equivalents.

With respect to the VA903b products, the infringed claims include, at least, claims 35, 36, 44-45, and 55-56 of the '641 Patent and claims 33-36 and 40 of the '718 Patent, which are infringed literally, or, in the alternative, under the doctrine of equivalents.

With respect to the VE150mb products, the infringed claims include, at least, claims 35, 36, 44-45, and 55 of the '641 Patent and claims 33-36 and 40 of the '718 Patent, which are infringed literally, or, in the alternative, under the doctrine of equivalents.

With respect to the VX724 products, the infringed claims include, at least, claims 35, 36, 44-45, and 55-56 of the '641 Patent and claims 33-36 and 40 of the '718 Patent, which are infringed literally, or, in the alternative, under the doctrine of equivalents.

With respect to the VX910 products, the infringed claims include, at least, claims 35, 36, 44-45, and 55 of the '641 Patent and claims 33-36 and 40 of the '718 Patent, which are infringed literally, or, in the alternative, under the doctrine of equivalents.

With respect to the VX922 products, the infringed claims include, at least, claims 35, 36, 44-45, and 55 of the '641 Patent and claims 33-36 and 40 of the '718 Patent, which are infringed literally, or, in the alternative, under the doctrine of equivalents.

With respect to the VG2030wm products, the infringed claims include, at least, claims 35-38, 44 and 55-56 of the '641 Patent and claims 33-36 and 40 of the '718 Patent, which are infringed literally, or, in the alternative, under the doctrine of equivalents.

With respect to the VP920b products, the infringed claims include, at least, claims 35-36, 38-39, 44 and 55-56 of the '641 Patent and claims 33-36 and 40 of the '718 Patent, which are infringed literally, or, in the alternative, under the doctrine of equivalents.

With respect to the VX2035wm products, the infringed claims include, at least, claims 35-36, 38, 44 and 55-56 of the '641 Patent and claims 33-36 and 40 of the '718 Patent, which are infringed literally, or, in the alternative, under the doctrine of equivalents.

With respect to the VX2235wm products, the infringed claims include, at least, claims 35-36, 44-45, and 55-56 of the '641 Patent and claims 33-36 and 40 of the '718 Patent, which are infringed literally, or, in the alternative, under the doctrine of equivalents.

With respect to the VX2245wm products, the infringed claims include, at least, claims 35-36, 44-45, and 55-56 of the '641 Patent and claims 33-36 and 40 of the '718 Patent, which are infringed literally, or, in the alternative, under the doctrine of equivalents.

With respect to the VG730m products, the infringed claims include, at least, claims 35-36, 44-45, and 55 of the '641 Patent and claims 33-36 and 40 of the '718 Patent, which are infringed literally, or, in the alternative, under the doctrine of equivalents.

With respect to the VP2330 products, the infringed claims include, at least, claims 35-36, 38-39, 44-45, and 55-56 of the '641 Patent and claims 33-36 and 40 of the '718 Patent, which are infringed literally, or, in the alternative, under the doctrine of equivalents.

With respect to the VP912b products, the infringed claims include, at least, claims 35-36, 38-39, 44, and 55-56 of the '641 Patent and claims 33-36 and 40 of the '718 Patent, which are infringed literally, or, in the alternative, under the doctrine of equivalents.

With respect to the VP171 products, the infringed claims include, at least, claims 35-36, 38-39, 44, and 55-56 of the '641 Patent and claims 33-36 and 40 of the '718 Patent, which are infringed literally, or, in the alternative, under the doctrine of equivalents.

With respect to the VG2230wm products, the infringed claims include, at least, claims 35-36, 38, 44-45, and 55-56 of the '641 Patent and claims 33-36 and 40 of the '718 Patent, which are infringed literally, or, in the alternative, under the doctrine of equivalents.

With respect to the VX1945wm products, the infringed claims include, at least, claims 35-36 and 55 of the '641 Patent and claims 33-36 and 40 of the '718 Patent, which are infringed literally, or, in the alternative, under the doctrine of equivalents.

With respect to the VA703b products, the infringed claims include, at least, claims 35-36, 44-45, and 55-56 of the '641 Patent and claims 33-36 and 40 of the '718 Patent, which are infringed literally, or, in the alternative, under the doctrine of equivalents.

With respect to the Q170 products, the infringed claims include, at least, claims 35-36, 38-39, and 55-56 of the '641 Patent and claims 33-35 and 40 of the '718 Patent, which are infringed literally, or, in the alternative, under the doctrine of equivalents.

With respect to the VA1930wm products, the infringed claims include, at least, claims 35-36, 44-45, and 55-56 of the '641 Patent and claims 33-36 and 40 of the '718 Patent, which are infringed literally, or, in the alternative, under the doctrine of equivalents.

With respect to the VP201b products, the infringed claims include, at least, claims 35-36 and 55-56 of the '641 Patent and claims 33-36 and 40 of the '718 Patent, which are infringed literally, or, in the alternative, under the doctrine of equivalents.

With respect to the VG910b products, the infringed claims include, at least, claims 35-36, 44-45, and 55-56 of the '641 Patent and claims 33-36 and 40 of the '718 Patent, which are infringed literally, or, in the alternative, under the doctrine of equivalents.

The following charts show infringement by comparing the claims of the Patents-in-Suit with the VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb VP930b, VP2130b-1, VP191b, VP191s, VG710b, VG710s, VA903b, VE150mb, VX724, VX910, VX922, VG2030wm, VP920b, VX2035wm, VX2235wm, VX2245wm, VG730m, VP2330, VP912b, VP171, VG2230wm, VX1945wm, VA703b, Q170, VA1930wm, VP201b, and VG910 products:

Claims in the '641 Patent	ViewSonic Monitors
35. A rear mountable flat panel display device capable of being mounted to a data processing device, the flat panel display device comprising:	The VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb, VP930b, VP2130b-1, VP191b, VP191s, VG710b, VG710s, VA903b, VE150mb, VX724, VX910, VX922, VG2030wm, VP920b, VX2035wm, VX2235wm, VX2245wm, VG730m, VP2330, VP912b, VP171, VG2230wm, VX1945wm, VA703b, Q170, VA1930wm, VP201b, and VG910 are each a rear mountable flat panel display device capable of being mounted to a data processing device.
a backlight unit including a first frame having a fastening part at a rear surface of the first frame, a flat display panel adjacent to the backlight unit; and	The VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb, VP930b, VP2130b-1, VP191b, VP191s, VG710b, VG710s, VA903b, VE150mb, VX724, VX910, VX922, VG2030wm, VP920b, VX2035wm, VX2235wm, VX2245wm, VG730m, VP2330, VP912b, VP171, VG2230wm, VX1945wm, VA703b, Q170, VA1930wm, VP201b, and VG910 each have a backlight unit including a first frame having a fastening

Claims in the '641 Patent	ViewSonic Monitors
	part at a rear surface of the first frame, a flat display panel adjacent to the backlight unit.
a second frame;	The VX900, VX2000, VA503b, VA2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb VP930b, VP2130b-1, VP191b, VP191s, VG710b, VG710s, VA903b, VE150mb, VX724, VX910, VX922, VG2030wm, VP920b, VX2035wm, VX2235wm, VX2245wm, VG730m, VP2330, VP912b, VP171, VG2230wm, VX1945wm, VA703b, Q170, VA1930wm, VP201b, and VG910 each have a second frame.
wherein the flat display panel is between the first frame and the second frame, the first frame of the backlight unit capable of being fixed to a housing of the data processing device through the fastening part at the rear surface of the first frame.	The VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb, VP930b, VP2130b-1, VP191b, VP191s, VG710b, VG710s, VA903b, VE150mb, VX724, VX910, VX922, VG2030wm, VP920b, VX2035wm, VX2235wm, VX2245wm, VG730m, VP2330, VP912b, VP171, VG2230wm, VX1945wm, VA703b, Q170, VA1930wm, VP201b, and VG910 each have a flat display panel that is between the first frame and the second frame, the first frame of the backlight unit capable of being fixed to a housing of the data processing device through the fastening part at the rear surface of the first frame.
36. The rear mountable flat panel display device according to claim 35, wherein the fastening part includes a fastening hole.	In addition to the elements listed above that pertain to the limitations of claim 35, the VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb, VP930b, VP2130b-1, VP191b, VP191s, VG710b, VG710s, VA903b, VE150mb, VX724, VX910, VX922, VG2030wm, VP920b, VX2035wm, VX2235wm, VX2245wm, VG730m, VP2330, VP912b, VP171, VG2230wm, VX1945wm, VA703b, Q170, VA1930wm, VP201b, and VG910 each have a fastening part that includes a fastening hole.
38. The rear mountable flat panel display device according to claim 36, wherein the fastening part includes at least two fastening holes at two corners of the first frame.	In addition to the elements listed above that pertain to the limitations of claim 36, the VA503b, VP2030b, VP930b, VP2130b-1, VP191b, VP191s, VG710b, VG2030wm, VP920b, VX2035wm, VP2330, VP912b, VP171, VG2230wm, and Q170 each have fastening parts that include at least two fastening holes at two

Claims in the '641 Patent	ViewSonic Monitors
	corners of the first frame.
39. The rear mountable flat panel display device according to claim 36, wherein the fastening part includes four fastening holes at four corners of the first frame.	In addition to the elements listed above that pertain to the limitations of claim 36, the VA503b, VP2030b, VP930b, VP2130b-1, VP191b, VP191s, VG710b, VP920b, VP2330, VP912b, VP171, and Q170 each have fastening parts that include four fastening holes at four corners of the first frame.
44. The rear mountable flat panel display device according to claim 35, wherein the fastening part includes a protruding portion protruding away from the flat display panel.	In addition to the elements listed above that pertain to the limitations of claim 35, VX900, VX2000, VA503b, VG2021m, VX924, VG920, VP230mb, VP930b, VP191b, VP191s, VA903b, VE150mb, VX724, VX910, VG2030wm, VP920b, VX2035wm, VX2235wm, VX2245wm, VG730m, VP2330, VP912b, VP171, VG2230wm, VA703b, VA1930wm, and VG910b each have a fastening part that includes a protruding portion protruding away from the flat display panel.
45. The rear mountable flat panel display device according to claim 44, wherein the protruding portion includes a peg having a fastening hole.	In addition to the elements listed above that pertain to the limitations of claim 44, the VX900, VX2000, VA503b, VG2021m, VX924, VG920, VP230mb, VP930b, VP191b, VP191s, VA903b, VE150mb, VX724, VX910, VX2235wm, VX2245wm, VG730m, VP2330, VA703b, VG2230wm, VA1930wm, and VG910b each have a protruding portion that includes a peg having a fastening hole.
55. A rear mountable flat panel display device comprising:	The VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb, VP930b, VP2130b-1, VP191b, VP191s, VG710b, VG710s, VA903b, VE150mb, VX724, VX910, VX922, VG2030, VP206, VX2035wm, VX2235wm, VX2245wm, VG730m, VP2330, VP912b, VP171, VG2230wm, VX1945wm, VA703b, Q170, VA1930wm, VP201b, and VG910and are each a rear mountable flat panel display device.
a first frame having a fastening part at a rear surface of the first frame;	The VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb, VP930b, VP2130b-1, VP191b, VP191s, VG710b, VG710s, VA903b, VE150mb, VX724, VX910, VX922, VG2030wm, VP920b, VX2035wm, VX2235wm, VX2245wm, VG730b, VP2330, VP912b, VP171, VG2230wm, VX1945wm, VA703b, Q170,

Claims in the '641 Patent	ViewSonic Monitors
	VA1930wm, VP201b, and VG910 each have a first frame having a fastening part at a rear surface of the first frame.
a second frame; and	The VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb, VP930b, VP2130b-1, VP191b, VP191s, VG710b, VG710s, VA903b, VE150mb, VX724, VX910, VX922, VG2030wm, VP920b, VX2035wm, VX2235wm, VX2245wm, VG730m, VP2330, VP912b, VP171, VG2230wm, VX1945wm, VA703b, Q170, VA1930wm, VP201b, and VG910 each have a second frame.
a flat display panel between the first and second frames;	The VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb, VP930b, VP2130b-1, VP191b, VP191s, VG710b, VG710s, VA903b, VE150mb, VX724, VX910, VX922, VG2030wm, VP920b, VX2035wm, VX2235wm, VX2245wm, VG730m, VP2330, VP912b, VP171, VG2230wm, VX1945wm, VA703b, Q170, VA1930wm, VP201b, and VG910 each have a flat display panel between the first and second frames.
wherein the first frame is capable of being fixed to a housing of a data processing device through the fastening part at the rear surface of the first frame.	The VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb, VP930b, VP2130b-1, VP191b, VP191s, VG710b, VG710s, VA903b, VE150mb, VX724, VX910, VX922, VG2030wm, VP920b, VX2035wm, VX2235wm, VX2245wm, VG730m, VP2330, VP912b, VP171, VG2230wm, VX1945wm, VA703b, Q170, VA1930wm, VP201b, and VG910 each have a first frame that is capable of being fixed to a housing of a data processing device through the fastening part at the rear surface of the first frame.
56. A rear mountable flat panel display device comprising:	The VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb, VP930b, VP2130b-1, VP191b, VP191s, VG710b, VG710s, VA903b, VX724, VG2030wm, VP920b, VX2035wm, VX2235wm, VX2245wm, VP2330, VP912b, VP171, VG2230wm, VA703b, Q170, VA1930wm, VP201b, and VG910 are each a rear mountable flat panel display device.

Claims in the '641 Patent	ViewSonic Monitors
a first frame having a fastening part at a rear surface of the first frame;	The VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb, VP930b, VP2130b-1, VP191b, VP191s, VG710b, VG710s, VA903b, VX724, VG2030wm, VP920b, VX2035wm, VX2235wm, VX2245wm, VP2330, VP912b, VP171, VG2230wm, VA703b, Q170, VA1930wm, VP201b, and VG910 each have a first frame having a fastening part at a rear surface of the first frame.
a second frame;	The VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb, VP930b, VP2130b-1, VP191b, VP191s, VG710b, VG710s, VA903b, VX724, VG2030wm, VP920b, VX2035wm, VX2235wm, VX2245wm, VP2330, VP912b, VP171, VG2230wm, VA703b, Q170, VA1930wm, and VG910 each have a second frame.
and a flat display panel between the first and second frames;	The VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb, VP930b, VP2130b-1, VP191b, VP191s, VG710b, VG710s, VA903b, VX724, VG2030wm, VP920b, VX2035wm, VX2235wm, VX2245wm, VP2330, VP912b, VP171, VG2230wm, VA703b, Q170, VA1930wm, VP201b, and VG910 each have a flat display panel between the first and second frames.
wherein the first frame is capable of being fixed to a housing of a data processing device through the fastening part at the rear surface of the first frame and the flat display panel is rear mounted.	The VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb, VP930b, VP2130b-1, VP191b, VP191s, VG710b, VG710s, VA903b, VX724, VG2030wm, VP920b, VX2035wm, VX2235wm, VX2245wm, VP2330, VP912b, VP171, VG2230wm, VA703b, Q170, VA1930wm, VP201b, and VG910 each have a first frame that is capable of being fixed to a housing of a data processing device through the fastening part at the rear surface of the first frame and the flat display panel is rear mounted.

Claims in the '718 Patent	ViewSonic Monitors
33. A method of assembling a rear	The VX900, VX2000, VA503b, VG2021m, N2000,

Claims in the '718 Patent	ViewSonic Monitors
mountable flat panel display device capable of being mounted to a housing, comprising:	VP2030b, VX700, VX924, VG920, VP230mb, VP930b, VP2130b-1, VP191b, VP191s, VG710b, VG710s, VA903b, VE150mb, VX724, VX910, VX922, VG2030wm, VP920b, VX2035wm, VX2235wm, VX2245wm, VG730m, VP2330, VP912b, VP171, VG2230wm, VX1945wm, VA703b, Q170, VA1930wm, VP201b, and VG910 are each assembled via a method of assembling a rear mountable flat panel display device capable of being mounted to a housing.
placing a flat display panel on a top surface of a backlight unit having a first frame, the first frame having a fastening element for fastening the first frame to the housing, said fastening element being located on a rear surface opposite the top surface of the backlight unit where the flat display panel is placed;	The method of assembling each of the VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb, VP930b, VP2130b-1, VP191b, VP191s, VG710b, VG710s, VA903b, VE150mb, VX724, VX910, VX922, VG2030wm, VP920b, VX2035wm, VX2235wm, VX2245wm, VG730m, VP2330, VP912b, VP171, VG2230wm, VX1945wm, VA703b, Q170, VA1930wm, VP201b, and VG910 includes placing a flat display panel on a top surface of a backlight unit having a first frame, the first frame having a fastening element for fastening the first frame to the housing, said fastening element being located on a rear surface opposite the top surface of the backlight unit where the flat display panel is placed.
placing a second frame on the flat display panel; and	The method of assembling each of the VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb, VP930b, VP2130b-1, VP191b, VP191s, VG710b, VG710s, VA903b, VE150mb, VX724, VX910, VX922, VG2030wm, VP920b, VX2035wm, VX2235wm, VX2245wm, VG730m, VP2330, VP912b, VP171, VG2230wm, VX1945wm, VA703b, Q170, VA1930wm, VP201b, and VG910 includes placing a second frame on the flat display panel.
fixing the flat display panel between the first frame of the backlight unit and the second frame.	The method of assembling each of the VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb, VP930b, VP2130b-1, VP191b, VP191s, VG710b, VG710s, VA903b, VE150mb, VX724, VX910, VX922, VG2030wm, VP920b, VX2035wm, VX2235wm, VX2245wm, VG730m, VP2330, VP912b, VP171, VG2230wm, VX1945wm, VA703b, Q170, VA1930wm, VP201b, and VG910 includes fixing the

Claims in the '718 Patent	ViewSonic Monitors
	flat display panel between the first frame of the backlight unit and the second frame.
34. The method of claim 33, wherein the fastening element comprises a fastening hole.	In addition to the elements listed above that pertain to the limitations of claim 33, the VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb, VP930b, VP2130b-1, VP191b, VP191s, VG710b, VG710s, VA903b, VE150mb, VX724, VX910, VX922, VG2030wm, VP920b, VX2035wm, VX2235wm, VX2245wm, VG730m, VP2330, VP912b, VP171, VG2230wm, VX1945wm, VA703b, Q170, VA1930wm, VP201b, and VG910 each have a fastening element that comprises a fastening hole.
35. The method of claim 33, wherein the fastening element comprises a screw hole.	In addition to the elements listed above that pertain to the limitations of claim 33, the VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb, VP930b, VP2130b-1, VP191b, VP191s, VG710b, VG710s, VA903b, VE150mb, VX724, VX910, VX922, VG2030wm, VP920b, VX2035wm, VX2235wm, VX2245wm, VG730m, VP2330, VP912b, VP171, VG2230wm, VX1945wm, VA703b, Q170, VA1930wm, VP201b, and VG910 each have a fastening element that comprises a screw hole.
36. The method of claim 33, wherein the fastening element comprises a stepped hole.	In addition to the elements listed above that pertain to the limitations of claim 33, the VX900, VX2000, VA503b, VG2021m, VP930b, VP191b, VP191s, VA903b, VE150mb, VX724, VX910, VG2030wm, VP920b, VX2035wm, VX2235wm, VX2245wm, VG730m, VP2330, VP912b, VP171, VG2230wm, VA703b, Q170, VA1930wm, VP201b, and VG910 each have a fastening element that comprises a stepped hole.
40. A rear mountable method of assembling a liquid crystal display (LCD) device comprising:	The VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb, VP930b, VP2130b-1, VP191b, VP191s, VG710b, VG710s, VA903b, VE150mb, VX724, VX910, VX922, VG2030wm, VP920b, VX2035wm, VX2235wm, VX2245wm, VP2330, VP912b, VP171, VG2230wm, VX1945wm, VA703b, Q170, VA1930wm, VP201b,

Claims in the '718 Patent	ViewSonic Monitors
	and VG910 are each assembled via a rear mountable method of assembling a liquid crystal display (LCD) device.
arranging the LCD device on a inner surface of a display case, wherein the display case has an inner surface and back;	The method of assembling each of the VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb, VP930b, VP2130b-1, VP191b, VP191s, VG710b, VG710s, VA903b, VE150mb, VX724, VX910, VX922, VG2030wm, VP920b, VX2035wm, VX2235wm, VX2245wm, VP2330, VP912b, VP171, VG2230wm, VX1945wm, VA703b, Q170, VA1930wm, VP201b, and VG910 includes arranging the LCD device on an inner surface of a display case, wherein the display case has an inner surface and back.
attaching the LCD device to the display case from the back of the display case.	The method of assembling each of the VX900, VX2000, VA503b, VG2021m, N2000, VP2030b, VX700, VX924, VG920, VP230mb, VP930b, VP2130b-1, VP191b, VP191s, VG710b, VG710s, VA903b, VE150mb, VX724, VX910, VX922, VG2030wm, VP920b, VX2035wm, VX2235wm, VX2245wm, VG730m, VP2330, VP912b, VP171, VG2230wm, VX1945wm, VA703b, Q170, VA1930wm, VP201b, and VG910 includes attaching the LCD device to the display case from the back of the display case.

LPL will provide more detailed information at the appropriate time and based on further discovery, possibly including, for example, receipt and examination of the OEM documents the Special Master has recommended that ViewSonic produce to LPL, deposition testimony of ViewSonic's witnesses yet to be conducted, deposition testimony of third party witnesses yet to be conducted, in or after submission of expert reports, in its *Markman* briefing, and/or after the Special Master issues his claim construction report and recommendation, and/or after the Court issues its claim construction order.

INTERROGATORY NO. 2:

For each allegedly infringing ViewSonic product identified by you in response to Interrogatory No. 1, identify the circumstances under which LPL first considered that the ViewSonic product might infringe any claim of one or more of the Patents-in Suit, including the dates LPL first learned of the product, any efforts to verify whether or not the product infringes, the names of LPL employees who learned of or investigated the alleged infringement, and the date, place and reasons that any of these events occurred.

OBJECTIONS AND ANSWER:

LPL objects to this Interrogatory to the extent that it seeks information protected by the attorney-client privilege or the work product doctrine. LPL also objects to this Interrogatory as vague and ambiguous, including, for example, with respect to the terms "first considered" and "first learned" because, for example, it cannot be determined when each and every employee of LPL first became aware of and/or purchased for any purpose a ViewSonic VX900 monitor.

Subject to and without waiving these objections and the general objections, LPL states as follows:

As stated in response to Interrogatory No. 1, LPL cannot currently identify all ViewSonic products that infringe, and LPL is seeking discovery from ViewSonic relevant to this issue. LPL first considered that the ViewSonic VX900 monitor infringed in December 2003, based on analysis by counsel, which is protected by attorney-client privilege and the work product doctrine. LPL retained an expert, Mr. William Bohannon, to analyze the ViewSonic VX900 for infringement. Mr. Bohannon first analyzed a ViewSonic VX900 in January 2004. Mr. Bohannon continued to analyze the ViewSonic VX900 and he completed his declaration in May 2004. Also in May 2004, Mr. Bohannon analyzed a second ViewSonic VX900 monitor before LPL filed its complaint in this action. LPL reserves the right to supplement this Interrogatory answer, if appropriate, when and if additional information becomes available, or otherwise.

SUPPLEMENTAL RESPONSE AND OBJECTIONS

categorically an entire set of Requests for Admissions (many of which, in turn, are objectionable for the reasons stated in LPL's responses to those Requests for Admissions). LPL reserves the right to supplement this Interrogatory response, if appropriate, when and if additional information becomes available, or otherwise.

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